

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all others similarly situated,

Plaintiff,

- against -

THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST AND BANKING CO., LTD., THE NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND BANKING CORPORATION, SUMITOMO MITSUI BANKING CORPORATION, J.P. MORGAN CHASE & CO., J.P. MORGAN CHASE BANK, NATIONAL ASSOCIATION, J.P. MORGAN SECURITIES PLC, MIZUHO CORPORATE BANK, LTD., DEUTSCHE BANK AG, THE SHOKO CHUKIN BANK, LTD., SHINKIN CENTRAL BANK, UBS AG, UBS SECURITIES JAPAN CO. LTD., THE BANK OF YOKOHAMA, LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL BANK OF SCOTLAND GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS SECURITIES JAPAN LIMITED, BARCLAYS BANK PLC, CITIBANK, NA, CITIGROUP, INC., CITIBANK, JAPAN LTD., CITIGROUP GLOBAL MARKETS JAPAN, INC., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., HSBC HOLDINGS PLC, HSBC BANK PLC, LLOYDS BANKING GROUP PLC, ICAP EUROPE LIMITED, R.P. MARTIN HOLDINGS LIMITED, MARTIN BROKERS (UK) LTD., TULLETT PREBON PLC, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 12-cv-3419  
(GBD) (HBP)

**PLAINTIFF'S NOTICE OF MOTION FOR CLASS CERTIFICATION  
AND APPOINTMENT OF CLASS COUNSEL**

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, the Declaration of Raymond P. Girnys and the exhibits attached thereto, and the record herein, Plaintiff Jeffrey Laydon through his undersigned attorneys, will respectfully move this Court, before the Honorable George B. Daniels, Courtroom 11A, at the United States Courthouse, 500 Pearl Street,

New York, NY 10007, at a date and time to be set by the Court, for an Order pursuant to FED. R.

Civ. P. 23(a), (b)(3) and (g) certifying the proposed Class of :

All persons or entities that purchased or sold a Euroyen TIBOR futures contract on the Chicago Mercantile Exchange (“CME”) during the period of at least January 1, 2006 through at least December 31, 2010, inclusive (the “Class Period”). Excluded from the Class are the Defendants and any parent, subsidiary, affiliate, or agent of any Defendant;

appointing Plaintiff as the representative of the proposed Class; appointing Lowey Dannenberg,

P.C. as Class Counsel for the proposed Class; and providing any further relief the Court deems just and proper.

Dated: September 27, 2019  
White Plains, New York

**LOWEY DANNENBERG, P.C.**

By: /s/ Vincent Briganti

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